

REMARKS

Applicant has reviewed and considered the Office Action mailed on January 22, 2003, and the references cited therewith.

Claim 1 is amended and new claims 12-21 are added. As a result, claims 1-7 and 12-21 are now pending in this application. Support for new claims 12-21 is found at least on page 3, lines 20-24, and starting at Col. 6, line 30. Support for a second input element in claim 21 is found at least on page 5, lines 27-28.

§102 Rejection of the Claims

Claims 1-2, 4-5 and 7 were rejected under 35 USC § 102(e) as being anticipated by Jie et al. (US 6,133,954). This rejection is respectfully traversed. Applicant reserves the right to swear behind the reference at a later date. However, the MPEP requires that "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." See M.P.E.P. § 2131. Because the Applicants assert that Jie et al. does not disclose the identical invention claimed, this rejection is respectfully traversed.

Claim 1 of the present application recites: "a semiconductor visual display element" that is connected to a logic circuit. Jie et al. describes a "photodiode array", which detects light. A visual display element is something that displays information as described starting on page 7, line 24 by the emission of light. The photodiode array of Jie et al. does not emit light. It is not a display element by any sense of the words. As each and every element of claim 1 has not been shown to be taught or inherent in Jie et al. a prima facie case of anticipation has not been established, and the rejection should be withdrawn.

With respect to claim 2, it is respectfully pointed out that what the Office Action refers to as a "semiconductor visual display element (10)", is actually formed of "closely-adjoined light-detecting cells 10" in Col. 6, lines 56-64. Thus, Jie et al. does not disclose or teach a display element and actually only detects light. Also, dependent claims 4 and 5 further describe the display element, and therefore distinguish from Jie et al. Claim 7 identifies several embodiments of the sensor element which are not shown in Jie et al. Jie et al. is directed toward an integrated-circuit color camera chip. There is no discussion of any of the sensors referenced in claim 7,

consisting of strain gauges, thermal gauges, radiation gauges, and chemically responsive gauges. Applicant cannot think of any reasonable basis for asserting that one would be necessary in a camera and inherent in sensor element 15, which is labeled a pixel detector in FIG. 1.

Claims 1-3 and 7 were rejected under 35 USC § 102(e) as being anticipated by Wunderman et al. (US 6,122,042). This rejection is respectfully traversed. Applicant reserves the right to swear behind the reference at a later date.

Claim 1, as amended, calls for "a micromechanical element comprising a support substrate for supporting a micromechanical sensor element". Wunderman et al. does not recite a micromechanical sensor element as claimed. The sensor element 114 referenced in the Office Action is an optical detector, not a micromechanical sensor element. Since Wunderman et al. does not show each and every element of the invention as claimed, a *prima facie* case of anticipation has not been established. It is respectfully requested that the rejection be withdrawn.

§103 Rejection of the Claims

Claims 4-6 were rejected under 35 USC § 103(a) as being unpatentable over Wunderman et al. (US 6,122,042) in view of Ogihara et al. (US 6,222,208 B1). Because a *prima facie* case of obviousness has not been established, the Applicants respectfully traverse this rejection. As indicated above, Wunderman et al. lacks a micromechanical sensor as claimed in claim 1, and hence claims 4-6 which depend from claim 1. Ogihara et al. is not cited as providing this missing element. Therefore, a *prima facie* case of obviousness has not been established, and the rejection should be withdrawn.

New claim 12 is believed to distinguish the references for at least the same reasons as claim 1. The additional aspect of the sensor being moveable further distinguishes the references. New claims 13-21 are believed to distinguish at least based on the inclusion of a semiconductor visual display element, as well as other elements present in the other independent claims. The LED's of Wunderman et al. are not used as a display, but are part of a sensor that includes light detectors which detect radiation from an object illuminated by the LEDs as seen in FIG. 1.

AMENDMENT AND RESPONSE UNDER 37 CFR § 1.111

Serial Number: 09/346283

Filing Date: July 1, 1999

Title: INTEGRATED CIRCUIT WITH UNIFIED INPUT DEVICE, MICROPROCESSOR AND DISPLAY SYSTEMS

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Dkt: 450.202US1

Conclusion

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney (612-373-6972) to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 50-0439.

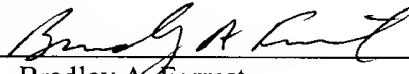
Respectfully submitted,

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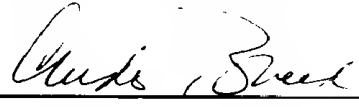
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By 
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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Commissioner of Patents, Washington, D.C. 20231, on this 22 day of April, 2003.

Candis B. Buendino

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